

United States Department of Justice
Office of the United States Trustee
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Elizabeth Ziegler Young,
for the United States Trustee
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE

Adrian Modesto Torres,

Debtor.

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§

Case No. 23-41966-MXM-7

**Agreed Motion to Extend Deadline to Object to Discharge Under 11 U.S.C. § 727
or Move for Dismissal Under 11 U.S.C. § 707(b)(3) from
November 13, 2023, to January 12, 2024**

The United States Trustee for Region 6 files this agreed motion to extend deadline for the United States Trustee to object to discharge under 11 U.S.C. § 727 or to move for dismissal under 11 U.S.C. § 707(b)(3) from **Monday, November 13, 2023, to Friday, January 12, 2024**. The United States Trustee would show:

1. This case commenced on July 6, 2023, with a Chapter 13 petition under 11 U.S.C. § 1301 et seq. filed in the United States Bankruptcy Court for the Northern District of Texas.
2. On August 1, 2023, the case converted to chapter 7. [Docket No. 23, Order Converting the Case to Chapter 7].
3. The deadline for the United States Trustee to file a complaint objecting to discharge

under 11 U.S.C. § 727 or to move to dismiss under 11 U.S.C. § 707(b)(3) is set for **Monday, November 13, 2023.**

4. The United States Trustee is investigating this case. The United States Trustee has recently received documents and will be conducting a 2004 exam of the Debtor.

5. In order to avoid the expense, trauma and waste of resources which would occur if a complaint under 11 U.S.C. § 727 or a motion under 11 U.S.C. § 707(b)(3) were prematurely filed, the United States Trustee requests an extension of deadlines until **Friday, January 12, 2024.**

5 The United States Trustee has communicated with the Debtor's attorney, Jim Morrison, and he agrees to extend the deadline for the United States Trustee in this case.

The United States Trustee prays that his deadline to object to discharge under 11 U.S.C. § 727 or to move to dismiss under 11 U.S.C. § 707(b)(3) be extended to **Friday, January 12, 2024.** The United States Trustee prays for any other relief the Court deems appropriate.

DATED: **October 30, 2023**

Respectfully submitted

KEVIN M. EPSTEIN
UNITED STATES TRUSTEE
/s/ Elizabeth Ziegler Young
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Certificate of Conference

Pursuant to Local Rule 7.1, on **October 30, 2023**, I communicated with Jim Morrison, and he has agreed to an extension of the deadlines in this case.

/s/ Elizabeth Ziegler Young
Elizabeth Ziegler Young

Certificate of Service

I certify that I sent a copy of the foregoing document via BMC Group via first-class, United States mail, postage prepaid or via ECF on **October 30, 2023**, to the following:

/s/ Elizabeth Ziegler Young
Elizabeth Ziegler Young

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